

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

CONSTANTINO GEORGIU,  <i>Plaintiff,</i>  v.  BATTERY JUNCTION; LG CHEM, LTD., and DOES 1-50,  <i>Defendants.</i>	Civil Action No. 4:21-cv-00418-O  <b>PLAINTIFF’S NOTICE OF TAKING ORAL AND VIDEOTAPED DEPOSITION OF TROY HAYES, Ph.D., P.E. AND FOR PRODUCTION OF DOCUMENTS</b>
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**TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that commencing **November 16, 2023 at 11 a.m. CST** pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiff will take the videotaped deposition of Defendant LG Chem, Ltd.’s (“LG Chem”) expert, **Troy Hayes, Ph.D., P.E.** under oath. The deposition will take place via Zoom and will be stenographically recorded by a court reporter authorized by law to take depositions and will continue from day to day until the examination is complete.

NOTICE IS FURTHER GIVEN that pursuant to Federal Rule of Civil Procedure 26, 30 and 34, the witness named in this notice is required to bring with him to the deposition the original or copy of all documents described as follows:

1. A list of all publications authored by the witness within the preceding ten years.
2. A current curriculum vitae or resume.
3. The witness's entire non-privileged file for the instant matter.
4. All materials or tangible evidence reviewed by the witness in rendering his opinion(s).

5. All materials or tangible evidence relied upon by the witness in rendering his opinion.
6. All materials or tangible evidence referenced by the expert witness in rendering his opinion.
7. A detailed list of books, treatises, articles, statutes, codes, standards, publications to be relied upon or cited by the witness in his report or testimony in this matter.
8. All studies, tests, research, notes, comp reports, appraisals and other documents which the expert is aware, including but not limited to any by the expert or the expert's assistant, which the expert witness will rely upon or refer to in presenting his expert witness testimony in this case.
9. All exhibits, charts, calculations, photographs, comp reports, appraisals or other material that the expert intends to use to explain, illustrate or otherwise support his testimony in this case.
10. Any and all retainer agreements or engagement letters pertaining to any service rendered or to be rendered by the witness in this matter.
11. A list of all books and articles authored or coauthored by the expert, and a copy of each article and book.

12. A list of cases where the witness served as an expert within the preceding ten (10) years.

Dated: October 24, 2023

Respectfully submitted

/s/ Sara Craig

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*Attorneys for Plaintiff*

**Certificate of Service**

The undersigned attorney of record hereby certifies that a true and correct copy of the foregoing document has been served on all other counsel of record in this cause via e-service on this the 24th day of October, 2023.

/s/Sara Craig